

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MICHELLE L. WHITE,	:	
	:	
Plaintiff,	:	Civil Action No. JFM 03 CV 26
	:	
v.	:	
	:	
GLOBAL COMMERCE AND	:	
INFORMATION, INC.,	:	
	:	
Defendant.	:	

JOINT MOTION FOR EXTENSION OF DEADLINES

Plaintiff Michelle L. White and defendant Global Commerce and Information, Inc. hereby jointly move the Court for a sixty (60) day extension of the discovery and dispositive motions deadlines set forth in the Scheduling Order. The grounds for this motion are as follows:

1. Discovery is currently scheduled to close on June 23, 2003. No trial date has yet been set in this action.
2. The parties are actively engaged in discovery. Plaintiff served her First Set of Interrogatories and First Set of Requests for Production on defendant on February 21, 2003. Defendant served its written responses on April 9, 2003. On April 14, 2003, defendant served responsive documents on plaintiff. On May 2,

2003, defendant served its First Set of Interrogatories and First Set of Requests for Production of Documents on plaintiff. By agreement of the parties, plaintiff's responses to defendant's discovery are due June 9, 2003.

3. The parties have been working to resolve issues related to defendant's discovery responses. After several letters and telephone conversations, the parties were able to resolve a number of their differences and defendant agreed to supplement certain of its interrogatory responses and provide further responsive documents. Defendant's counsel had hoped to receive this additional information by May 22, 2003 so that it could be provided to plaintiff. Due to a miscommunication, however, the information was not received and the person responsible for providing the information is out of the office for the week of May 26, 2003. Accordingly, it is conceivable the supplemental information will not be provided until sometime the week of June 2, 2003 at the earliest. This was the week the parties had planned on commencing depositions, which, due to these circumstances, will not be able to proceed and will be rescheduled.

4. Further, on May 23, 2003, plaintiff filed a letter with the Court regarding the procedure by which the parties should seek the Court's intervention to resolve the deficiencies plaintiff perceives with defendant's discovery responses that the parties were not able to resolve amongst themselves. That request is currently

pending. The commencement of depositions must necessarily be delayed pending the outcome of this dispute.

5. Based on the foregoing, the parties will be unable to complete discovery and depositions within the current discovery deadline.

6. For the reasons set forth above, the parties hereby request a sixty (60) day extension of deadlines to reflect the following new dates:

Discovery deadline; submission of status report	August 22, 2003
Requests for Admissions	August 29, 2003
Dispositive pretrial motions deadline	September 19, 2003

WHEREFORE, the parties jointly request that the Court grant their Joint Motion for Extension of Deadlines.

Respectfully submitted,

/s/ Anessa Abrams
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